

UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

Filed

AUG 2 2015

U.S. Magistrate Judge

United States of America

v.

DeLace Johnson

Case No. 3:15-mj-563-FKB

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 31, 2015 in the county of Hinds in the
Southern District of Mississippi, the defendant(s) violated:

Code Section

Offense Description


18 U.S.C. 922(g)(1)

Possession of a Firearm by a Convicted Felon

This criminal complaint is based on these facts:

See attached affidavit - "Exhibit A".

☒ Continued on the attached sheet.



Complainant's signature

A.J. Stingley, ATF

Printed name and title

Sworn to before me and signed in my presence.

Date: 8/27/2015



Judge's signature

City and state: Jackson, Mississippi

F. Keith Ball, U.S. Magistrate Judge

Printed name and title

Affidavit for Criminal Complaint

Probable Cause

I, A. Jeffery Stingley, being duly sworn and deposed, state the following:

I have been employed since April 2010 as a Task Force Officer with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). In conjunction with being a Task Force Officer with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) I also have been a Probation and Parole Agent with the Mississippi Department of Corrections for seven (7) years. Prior to service with ATF and Mississippi Department of Corrections I was employed as a patrolman with the Jackson Police Department from 2004-2005. In 2005 I was promoted to acting sergeant in administrations (Evidence and Property). I am a graduate of the Mississippi Law Enforcement Training Academy class of 167 September 1994. As an ATF Task Force Officer, I am empowered to investigate violations of Federal Firearms, Arson, Explosive, and Drug Laws.

During my tenure with ATF I have been involved in various capacities with numerous investigations involving the possession and trafficking of firearms and narcotics by convicted felons.

Based upon my own personal knowledge and information I have received from officers of the Mississippi Department of Corrections and ATF, I am aware of the following facts.

1. On July 31, 2015, Mississippi Department of Corrections (MDOC) Probation and Parole Office searched the residence of DeLace JOHNSON, located at 2482 Oak Grove Lane, Jackson, Mississippi 39212 based, in part, on information received from JOHNSON's girlfriend, Beverly Sistrunk that JOHNSON was in possession of a shotgun at this residence. This is JOHNSON's home of record. This is also Sistrunk's residence. During the search a Remington 870 Express Magnum 12 gauge shotgun, bearing serial number A311514M, loaded with one round of Winchester 12 gauge ammunition, was found inside of a pillow case in the air condition return. Both JOHNSON and Sistrunk stated the shotgun belonged to JOHNSON. MDOC Officers seized the firearm and ammunition, and arrested DeLace JOHNSON for violating the conditions of his probation.
2. MDOC requested the assistance of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Jackson Field Office. Special Agent Michael Knoll and ATF Task Force Agent A.J. Stingley provided assistance. Agents interviewed Beverly Sistrunk concerning the shotgun. Sistrunk stated JOHNSON was released from prison on Thursday, July 23, 2015. On July 24, JOHNSON purchased marijuana and began smoking and drinking alcohol. He assaulted Sistrunk on July 25, and again on July 29. He also threatened to kill her with his shotgun.

3. On August 20, 2015, TFO Stingley spoke with Mississippi Department of Corrections Probation and Parole Agent (PPA) Poole who advised the following concerning the threat made by JOHNSON against Sistrunk. PPA Poole said that according to Sistrunk, she was threatened to be shot by JOHNSON because she (Sistrunk) told JOHNSON he could no longer stay at her house because JOHNSON was using drugs. According to PPA Poole Sistrunk told her that JOHNSON said he was going to get a 9 mm because the shotgun would be too messy to kill her with.
4. According to Sistrunk, JOHNSON was awaiting a cash settlement from a previous auto accident to be deposited in his bank account. By July 29, the money was deposited, so he and Sistrunk obtained a check for \$11,000 to purchase a GMC Yukon from an unknown individual on Cooper Road, Jackson, Mississippi. Prior to leaving to go to Cooper Road, and while dealing with the purchase of the vehicle, JOHNSON received numerous phone calls from 601-xxx-xxxx via Sistrunk's phone. She stated this person is only known to her as "Nate". On one occasion when JOHNSON was speaking with Nate, JOHNSON asked Nate if he "had that pump for me?" ("Pump" is a slang term for a shotgun)
5. Upon the completion of the sale of the vehicle, she, JOHNSON, and DeAngelo LNU, aka "DiDi", went to 108 Queen Anne Lane, Jackson, Mississippi. Upon arriving at 108 Queen Anne Lane, JOHNSON and DiDi exited the vehicle and met with four young black men at the rear of the Yukon. They all spoke for a few minutes. They opened the back doors of the Yukon and then closed them shortly thereafter. Sistrunk stayed inside the vehicle and was not part of the conversation with JOHNSON and his companions. Soon thereafter, she, JOHNSON, and DiDi left 108 Queen Anne Lane and went home to 2482 Oak Grove Lane. When they arrived home, JOHNSON removed a shotgun from the rear storage area of the Yukon and put it in the closet of his room. Sistrunk stated she did not observe anyone place a shotgun in the vehicle, but knew there was no firearm in the vehicle when they purchased it.
6. Beverly Sistrunk further stated JOHNSON is a member of the Gangster Disciples street gang, but has not seen any literature. JOHNSON referred to her as his "Gangster Wife", and that a "Gangster Wife" can be killed with no remorse by her "Gangster Husband", and that she was expected to do whatever he told her to do. Sistrunk said during the interview that every time JOHNSON returns home from jail or prison, he is more violent and abusive with her. She has been dating JOHNSON for approximately 3 ½ years. DeAngelo LNU is JOHNSON's brother.
7. On July 31, 2015, TFO Stingley took possession of the above mentioned shotgun and shotgun shell from MDOC Officer Sheryl Poole. The shotgun and ammunition will be maintained in the Jackson ATF Field Office. Officer Poole stated she observed numerous items blue in color, and other Gangster Disciple paraphernalia within the home and JOHNSON's bedroom.
8. DeLace JOHNSON was convicted in Hinds County Circuit Court, for House Burglary, and received a 10 year sentence in the custody of the Mississippi Department of Corrections.

9. I have obtained information of a sentencing order from Hinds County Mississippi, indicating JOHNSON was sentenced to 10 years in the custody of the Mississippi Department of Corrections for Burglary of a Dwelling, cause number 13-0-248-00WAG dated August 3, 2013.
10. On August 19, 2015, ATF Task Force Officer Stingley confirmed the information on the Remington 870 Express Magnum 12 gauge shotgun. Additionally Task Force Officer Stingley consulted with ATF Firearms Interstate Nexus Expert Special Agent Raymond Connor, who confirmed that the firearm was manufactured outside the state of Mississippi and traveled in interstate commerce.

Based on the foregoing facts and circumstances, your affiant believes probable cause exist to believe Delace JOHNSON, did violate the Federal Firearms Laws in that he violated Title 18 U.S.C. 922(g)(1) – Possession of a firearm by someone who was convicted of a crime in which he could be sentenced for more than one year.

Further your affiant sayeth not.



A. Jeffery Stingley
Task Force Officer

Bureau of Alcohol, Tobacco, Firearms & Explosives

Sworn and subscribed by me this 27th day of August, 2015.



F. Keith Ball
United States Magistrate Judge